

U nited States Bankruptcy Court
Southern District of Texas
Houston Division

In re Walter E. Woodward

Debtor(s)

Case No. 19-30696-H4-13
Chapter 13

MOTION FOR AUTHORIZATION
TO SELL EXEMPT REAL PROPERTY

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN TWENTY-ONE (21) DAYS OF THE DATE THIS MOTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Walter E. Woodward, hereinafter referred to as Debtor in the above-styled and entitled case and files this Motion for Authorization to Sell Exempt Real Property pursuant to Section 363(f) and in support thereof would show this Court the following:

1. This Court has jurisdiction of this matter pursuant to 28 U.S.C. Sections 1334 and 157 and 11 U.S.C. Sections 363(f) and 1301.
2. This is a core proceeding under 28 U.S.C. Section 157(b)(2)(N).
3. This case was commenced by the Debtor filing a voluntary petition under Chapter 13 of the Bankruptcy Code on February 4, 2019.
4. The chapter 13 plan has not been confirmed.
5. Debtor seeks authorization to sell the following exempt real property as described below:

Lot 18, Block 1, Rancho Verde, Section 1, Harris County, Texas, more commonly referred to as 2131 Forest Ranch Drive Houston, Texas 77049.

6. The above-referenced property is **exempt**. Upon closing the sales proceeds shall be collected and paid to the following debts:

- a. Any outstanding ad valorem taxes;
- b. Any creditors who hold valid liens; and
- c. Closing costs and the usual and customary commissions.

7. Attorney hereby requests a fee in the amount of \$0.00 for prosecuting this motion for authorization to sell exempt real property.

8. Attorney hereby requests to be reimbursed a fee of \$0.00 for the costs incurred to file the motion for authorization sell exempt real property.

WHEREFORE, Debtor respectfully requests that upon hearing of the instant Motion, the Court enter an Order granting authorization to Sell Exempt Real Property, that Debtor have all such other and further relief, both at law and in equity to which he may be justly entitled.

Respectfully submitted:

Date April 5, 2019

Signature /s/ Emil R. Sargent

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